

## Remarks

This amendment is in response to the Office Letter mailed January 14, 2003, and made Final. Claims 1-25 are entered for examination. The Examiner rejects claims 1-25 under 35 U.S.C. 102(e) as being anticipated by Miloslavsky (US 5,946,387), hereinafter Miloslavsky.

In response to the Examiner's rejection, applicant herein provides arguments to more particularly point out the subject matter regarded as patentable by the applicant, distinguishing unarguably over the art of Miloslavsky. Applicant herein particularly references the "Response to Argument" portion of the Office letter kindly provided by the Examiner.

Regarding claims 1, 8, 15, 20, 22 and 23, the Examiner states Miloslavsky discloses a method and system for establishing a remote agent station from a call center (elements 121 and 122), comprising steps of: a) establishing a data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch (123 and 124) at the call center (Fig. 1 and col. 4-5 lines 65-66).

In the "Response to Arguments" portion of the Office Letter the Examiner states that he relates call center 121 and/or 122 of Miloslavsky with the remote stations of applicant's invention, and SCP 101, of Miloslavsky, to the telephony switch at the call center of applicant's invention. The Examiner states that Network 100 of Miloslavsky performs the same functions as that of applicant's claimed call center.

Applicant herein points out specific claim language not addressed by the Examiner when making the above statement. Applicant's claim 1, steps (c), (d) and (e) recite retrieving data associated with the selected incoming call from a database at the call center; forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the data

link and placing a call from the call center to a telephone at the remote agent station.

Applicant argues that the Network 100 of Miloslavsky fails to teach or suggest the limitations of steps (c), (d) and (e) of claim 1 as presented above. SCP 101 of Miloslavsky forwards calls to routing points at Call Centers, not remote agent stations as claimed. Applicant points out that remote agent stations are end destinations for the incoming call. Call Centers 121 and 122, of Miloslavsky, must forward the calls to end destinations at agent stations. Miloslavsky does teach making the agent routing decision at the Network 100, but does not teach placing a telephone connection directly to a computer platform at a remote agent station as claimed.

Further, applicant argues that Network 100 of Miloslavsky fails to disclose retrieving data associated with the selected incoming call from a database at the call center (*in the Examiner's view would relate to a database at the remote agent station*); forwarding the data associated with the selected incoming call to the computer platform at the remote agent station. Applicant points out that data coming from Network 100 in Miloslavsky is not routed directly to computer platforms at remote agent stations. Applicant argues that call data from Network 100 of Miloslavsky must be coordinated with the call at a routing point at the call center, then is forwarded to the agent station.

Applicant argues that there are no direct communication lines between computer platforms at agent stations of Miloslavsky and the Network 100. In applicant's invention as claimed a data link exists between a computer platform at the remote agent station and the Call Center. In applicant's invention as claimed a telephony connection is made from the call center to a telephony device at the agent station where the computer platform resides. Miloslavsky fails to disclose the type of connections and functionality as claimed in applicant's invention.

Applicant argues that the Examiner errs when relating a call center of Miloslavsky to the computer platforms at remote agent stations in applicant's invention. Calls are routed from the network 100 to *switches* at call centers in the

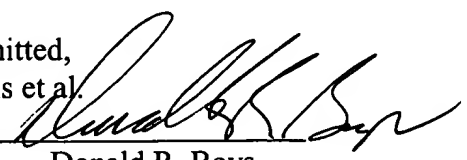
art of Miloslavsky. Miloslavsky teaches a system including a structure enabling the routing of calls from a telephony network to call centers, and in turn to agent stations at the call centers for the purpose of routing calls at the agent level from the network. Applicant's invention teaches a structure wherein remote agent stations are established in a separate physical location than the call center itself. Calls are routed directly to the remote agent station from the call center via a telephony (PSTN) connection, and information relating to the calls are routed directly to the remote agent station via a separate data connection to a CTI server at the call center. The two structures are not the same and cannot read on each other.

?  
Not in  
Claims

The PTO has upheld basic requirements of anticipation in that it is not enough to require that the disclosure in a single prior art reference disclose all of the claimed elements, rather, as stated by the Federal Circuit , anticipation requires the presence in a single disclosure of each and every element of the claimed invention , arranged as in the recited claim. Miloslavsky fails to disclose the elements and connections in the order specifically claimed in applicant's invention. The agents are not remote from the call center in the Miloslavsky reference.

Applicant believes claims 1, 8, 15, 20, 22 and 23 are patentable over the art of Miloslavsky as argued above. Applicant respectfully requests consideration, and that the case be passed quickly to issue. If there are any extensions of time required, such extensions are hereby requested. If there are any fees due, authorization is given to deduct the fees from deposit account 50-0534.

Respectfully Submitted,  
Dan Kikinis et al.  
by

  
Donald R. Boys  
Reg. No. 35,074

Donald R. Boys  
Central Coast Patent Agency  
P.O. Box 187  
Aromas, CA 95004  
(831) 726-1457